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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ALYSSA FAULSTICK, on behalf of
herself and all other similarly situated,

Plaintiff,

vs.

STATION CASINOS LLC d/b/a and a/k/a
KAOS DAYCLUB AND NIGHTCLUB;
RED ROCK RESORTS, INC. d/b/a and
a/k/a KAOS DAYCLUB AND
NIGHTCLUB;
EMPLOYEE(S)/AGENT(S) DOES 1-10;
AND ROE CORPORATIONS 11-20,
inclusive;

Defendants.

Case No.: 2:19-cv-01950-JAD-NJK

**AMENDED STIPULATION AND
ORDER TO
EXTEND TIME TO RESPOND
TO COMPLAINT**

(Sixth Request)

On July 15, 2020, this Honorable Court denied the parties SAO for a request up to and including July 31, 2020 based, *inter alia*, upon Plaintiff's conclusory assertion that the parties are "still discussing possible resolution of this matter" and that the Honorable Court's previous SAO stated that no further extensions will be granted. Docket No. 19 at 1. The parties herein bring this final amended SAO requesting up to and including July 31, 2020 for Defendants to Answer or otherwise Response as good cause is outlined below for this Court to understand such basis for granting this extension.

In an effort to justify the speedy, economic, and just resolution of the matter, the parties hereby submit an amended SAO to clarify and articulate to the Court specific reasons so to justify to the Court a final extension for two weeks, up to and including July 31, 2020, in this matter.

1 This matter involves an alleged putative class action for alleged violations of the
2 WARN Act in relation to the closing of the KAOS night club at the Palms Resort.

3 Defense counsel had foot surgery on July 15 and will be limiting his activities for
4 several days while recuperating.

5 Since the filing of the Complaint, counsel for both parties have not been delaying
6 or acting in a dilatory manner. Counsel for the parties have professionally, civilly, and
7 diligently exchanged communications, conducted multiple phone conferences involving
8 multiple persons, have exchanged correspondence involving the claims, have
9 exchanged certain data involving millions of alleged pay amounts, researched and
10 investigated the claims, and have been in constant discussion relating to the issues in
11 this case. The parties are working together to resolve this matter without the Court's
12 intervention and due diligence is being conducted.

13 Further, unfortunately, since Valentines Day, Plaintiff's counsel's father, a
14 practicing physician in our community, was in ICU and intubated for approximately a
15 month, then in IMU, and is now in an assisted living facility by Plaintiff counsel's office.
16 Plaintiff's counsel is assisting him with his currently pending divorce, supreme court
17 matter involving administrative claims: [https://www.reviewjournal.com/news/news-](https://www.reviewjournal.com/news/news-columns/paul-harasim/bad-handwriting-could-cost-doctor-his-license/)
18 [columns/paul-harasim/bad-handwriting-could-cost-doctor-his-license/](https://www.reviewjournal.com/news/news-columns/paul-harasim/bad-handwriting-could-cost-doctor-his-license/), and currently
19 other criminal and civil matters. This has required Plaintiff's counsel time and attention.

20 The parties herein only request two weeks, up to and including 7/31/2020, as a
21 potential resolution to this matter, *en toto*, for Defendants to answer or otherwise
22 respond to the Complaint so that the parties can effectively and accurately see if
23 resolution can be reached or if this matter must progress. It is not the intention of the
24 parties to delay or waste this Honorable Court's time, it is the intention of the parties to
25 not utilize the Court's time and work together civilly and effectively without the
26 involvement of the Court's limited time. The parties thus respectfully request this short
27 fourteen day extension.
28

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3 IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of record that
4 Defendants will have an extension of time up to and including July 31, 2020 to answer or
5 otherwise respond to Plaintiff's Complaint (ECF No. 1).

6 The parties apologize to the Court for their prior incomplete submission.

7 This is the amended sixth request for an extension of this deadline.

8 Dated this 16^h day of July 2020.

9 Dated this 16th day of July 2020. Dated this 16th day of July 2020.

10 Respectfully submitted,

Respectfully submitted,

11 /s/ Christian Gabroy

11 /s/ Scott M. Mahoney

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17 *Attorneys for Plaintiff*

Attorney for Defendants

18 **NO FURTHER EXTENSIONS**
19 **WILL BE GRANTED.**

17 **IT IS SO ORDERED.**

18 ~~UNITED STATES DISTRICT JUDGE/~~
19 ~~UNITED STATES MAGISTRATE JUDGE~~

20 Dated: July 17, 2020

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